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March 15, 2001

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VIA HAND DELIVERY

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, S.W., TW-A325
Washington, D.C. 20554

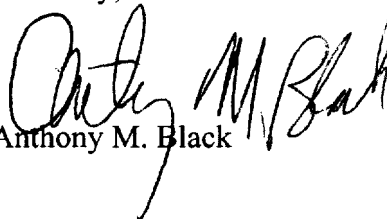
Re: Reply Comments of McLeodUSA Telecommunications Services, Inc.
(CC Docket 98-141, ASD 01-17)

Dear Ms. Salas:

Enclosed for filing in the above-referenced docket are an original and four (4) copies of McLeodUSA Telecommunications Services, Inc.'s ("McLeodUSA") Reply Comments.

I would appreciate your date-stamping the enclosed extra copy of this filing and returning it to me in the enclosed envelope with the courier I have waiting.

Sincerely,


Anthony M. Black

AMB/kas
enclosure

cc: Service List (attached)

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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MAR 15 2001

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

In re Applications of)
)
AMERITECH CORP.,)
Transferor,)
)
AND)
)
SBC COMMUNICATIONS, INC.,)
Transferee,)
)
For Consent to Transfer Control of Corporations)
Holding Commission Licenses and Lines)
Pursuant to Sections 214 and 310(d) of the)
Communications Act and Parts 5, 22, 25, 63,)
90, 95 and 101 of the Commission's Rules)

CC Docket No. 98-141

ASD 01-17

**REPLY COMMENTS OF
MCLEODUSA TELECOMMUNICATIONS SERVICES, INC.**

McLeodUSA Telecommunications Services, Inc. ("McLeodUSA"), through counsel and pursuant to the Commission's February 22, 2001 request for comments in the above-captioned proceeding,¹ hereby submits these reply comments in response to SBC Communications, Inc.'s ("SBC") initial comments filed on March 8, 2001.²

In its initial comments, McLeodUSA urged the Commission to disaggregate CIA Centrex in a manner that maintains or strengthens SBC's performance requirements as applied to CIA Centrex. To achieve this result, McLeodUSA recommended several modifications to address deficiencies in SBC's proposed disaggregation. SBC, in its initial comments, reiterates the points that it raised in its initial request for disaggregation filed on January 2, 2001. It raises no new facts or arguments not already addressed by McLeodUSA. Accordingly, McLeodUSA

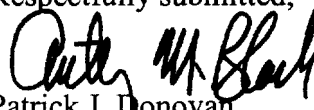
¹ *Common Carrier Bureau Seeks Comment on Proposed Change to SBC's Performance Measurements*, Public Notice, DA 01-332 (released Feb. 22, 2001).

² *SBC/Ameritech Merger Order Proposed Changes to SBC's Performance Measurements*, CC Docket No. 98-141, ASD File No. 99-49 (filed March 8, 2001) ("SBC's initial comments").

continues to recommend that the Commission disaggregate CIA Centrex in the manner described in McLeodUSA's initial comments.³

McLeodUSA notes that SBC's initial comments show that the parties agreed to disaggregate CIA Centrex with respect to four performance requirements as described in McLeodUSA's initial comments, and not only with respect to the Mean Installation Interval (FCC Performance Measure #6a).⁴ SBC's initial comments similarly show that, as discussed in McLeodUSA's initial comments, the requirements to which the parties previously agreed were interim requirements subject to further review by the parties in the first quarter of 2001.⁵ As part of that review, the parties will discuss changes that are needed in the interim intervals, such as the four business day interval that SBC has proposed for non-field work orders under FCC Performance Measure #6a.⁶ In light of the above, and for the reasons stated in McLeodUSA's initial comments, the Commission should not simply disaggregate CIA Centrex only with respect to FCC Performance Measure #6a, nor in the manner proposed by SBC. By disaggregating CIA Centrex as recommended by McLeodUSA, the Commission will ensure that such disaggregation is consistent with the non-discriminatory purposes of the performance requirements.

Respectfully submitted,



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Counsel for

McLeodUSA Telecommunications Services, Inc.

March 15, 2001

³ In the event SBC files reply comments responding to McLeodUSA's disaggregation proposal, McLeodUSA may comment on SBC's response in an *ex parte* filing.

⁴ SBC's initial comments, Attachment A, Illinois Disaggregation Schedule at 1-3; Attachment B at 3.

⁵ SBC's initial comments, Attachment A at 2, Attachment B at 3.

⁶ See McLeodUSA's initial comments at 7-8.

CERTIFICATE OF SERVICE

I hereby certify that, on this 15th day of March, 2001, one (1) copy of the Reply Comments of McLeodUSA Telecommunications Services, Inc., filed in CC Docket No. 98-141, ASD 01-17, was sent via postage prepaid, first-class mail to the following individuals:

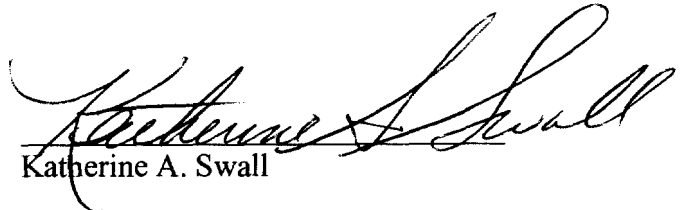
Al Syeles, Executive Director-Federal Regulatory
Sandra Wagner, Vice President-Federal Regulatory
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and sent to the following individuals via hand-delivery:

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Katherine A. Swall